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**REGIONAL HOUSING NEEDS ASSESSMENT APPEALS BOARD  
and  
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS**

**April 25, 2007  
Minutes**

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**THE FOLLOWING MINUTES ARE A SUMMARY OF ACTIONS TAKEN BY THE REGIONAL HOUSING NEEDS ASSESSMENT APPEALS BOARD. AN AUDIOCASSETTE TAPE OF THE ACTUAL MEETING IS AVAILABLE FOR LISTENING AT SCAG'S DOWNTOWN LOS ANGELES OFFICE.**

The Regional Housing Needs Assessment Appeals Board ("Board") held its meeting at SCAG's downtown Los Angeles office.

**Members Present**

Jon Edney (**Chair**) – Imperial County  
Gil Coerper – Orange County  
Carl Morehouse – Ventura County  
Paul Nowatka – Los Angeles County  
Tim Jasper – San Bernardino County (Morning Session Only)  
Charles White – Riverside County

**Alternate Members Present**

Mike Ten – Los Angeles County (Morning Session Only)  
Larry McCallon – San Bernardino County

**Members and Alternates Not Present**

Christine Barnes – Orange County (Alternate)  
Melanie Fesmire – Riverside County (Alternate)

**1.0 CALL TO ORDER & PLEDGE OF ALLEGIANCE**

The Hon. Jon Edney called the hearing to order at 9:00 AM. The Hon. Gil Coerper led the Board in the Pledge of Allegiance.

Hon. Edney provided clarification of the guidelines that were established at the Board's orientation meeting on April 5, 2007. Hon. Edney restated the time allowance for hearing presentations as follows: 30 minutes total to present an appeal or revision request; 10 minute presentation per jurisdiction; 5 minute presentation from staff; 5 minute rebuttal per jurisdiction; 10 minutes for public comment or testimony. At the discretion of the Board and/or the Chair, the verbal staff presentation may be waived due to the fact that the information is provided in written form, as part of the agenda packet.

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Hon. Edney requested that staff provide a clarification of the difference between the revision and the appeal process. Ms. Harris explained that the procedure for appeals and revisions is contained in a document and in state law, both referring to SB12, which is the recently adopted pilot program for SCAG RHNA, as well as the existing housing element law.

Ms. Harris stated that the revision process is a procedure whereby cities and counties may apply for RHNA adjustments, based on the existing factors in state law, which is referred to as AB 2158 factors. Revision requests may only be granted on the basis of AB 2158 factors. Ms. Harris further stated that revision requests do not require a public hearing. However, they will be heard in an open forum, and given the same amount of time relative to the Board's time allowance. Ms. Harris stated that there are three bases in which appeals may be considered. Those bases are as follows: 1) methodology; 2) Ten AB 2158 factors; and 3) changed circumstances.

Ms. Harris further stated that the Board has the ability to approve, partially approve, or deny any revision or appeal request. Those revision requests that are approved by the Board, provided they are still within the parameters of the total regional number for housing need given to us by State HCD, are taken off the regional total. Any appeals that are granted by the Board are required by State law to be redistributed among all the jurisdictions in the region, with the exception of those jurisdictions that are covered under delegated subregions.

Ms. Harris stated the delegated subregional areas as follows: Ventura Council of Governments; they will handle their own revision and appeal requests, and will not be subject to any SCAG reallocation. The City of Los Angeles and the City of San Fernando formed a subregion for the purposes of RHNA. They will handle their own revision and appeal requests, and will not be subject to any reallocation. The South Bay Cities COG, which runs from El Segundo to Rancho Palos Verdes, will handle its own revision and appeal requests, and will not be subject to any SCAG reallocation. Ms. Harris stated that the City of Rancho Palos Verdes was scheduled to be heard today, for both a revision and appeal request. Ms. Harris requested that a motion be made to transfer these items to South Bay Cities COG, pursuant to their acceptance of delegation.

A **MOTION** was made by the Hon. Paul Nowatka to withdraw, from the agenda, the revision request (5.1.10) and the appeal request (5.2.6) for the City of Rancho Palos Verdes. The **MOTION** was **SECONDED** by the Hon. Charles White and **UNANIMOUSLY APPROVED**.

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**2.0 PUBLIC COMMENT PERIOD**

There were no public comments made at this time.

**3.0 REVIEW AND PRIORITIZE AGENDA ITEMS**

A **MOTION** was made by the Hon. Paul Nowatka to reprioritize the agenda to accommodate jurisdiction schedules. The **MOTION** was **SECONDED** by the Hon. Carl Morehouse and **UNANIMOUSLY APPROVED**.

**4.0 INFORMATION ITEMS**

There were no information items presented.

**5.0 ACTION ITEMS**

**5.1 Consideration of Revision Requests**

**5.1.4 City of La Habra Heights**

Revision request to reduce draft RHNA allocation by 45% (39 units)

The City of La Habra representatives were not present. A **MOTION** was made by the Hon. Gil Coerper to continue their revision request to later in the session. The **MOTION** was **SECONDED** by the Hon. Charles White and **UNANIMOUSLY APPROVED**.

**5.1.2 City of Signal Hill**

Revision request to reduce draft RHNA allocation by 10% (25 units)

Gary Jones, Director of Community Development, stated that Signal Hill is supporting staff's recommendation for partial approval of their revision request (Revision #1). Signal Hill is also requesting a 20% reduction for low and very low income households (Revision #2).

Ms. Harris stated that staff had no additional comments.

*The Hon. Jon Edney asked for public comments for the City of Signal Hill. There were no comments.*

A **MOTION** was made by the Hon. Paul Nowatka to partially approve their revision request, (Revision #1) a reduction of 25 units as recommended by staff. The **MOTION** was **SECONDED** by the Hon. Gil Coerper. A **ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

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**Los Angeles County – Yes  
Orange County – Yes  
Riverside County – Yes  
San Bernardino County – Yes  
Ventura County – Yes  
Imperial County – Yes**

**Motion passed 6-0.**

**5.1.9 City of Duarte**

**Revision request to reduce draft RHNA allocation by 11.5% (49 units)**

The City of Duarte representatives were not present. A **MOTION** was made by the Hon. Charles White to continue their revision request to later in the session. The **MOTION** was **SECONDED** by the Hon. Gil Coerper and **UNANIMOUSLY APPROVED**.

**5.1.8 City of La Verne**

**Revision request to reduce draft RHNA allocation by 28.7% (257 units)**

Hal Fredericksen, Director of Community Development, stated the City's decision to request a revision was based on AB 2158 factors, i.e. the availability of land suitable for urban development or conversion to residential use, and lands protected from urban development under existing Federal or State programs. Mr. Fredericksen stated that the allocation of 897 units is not a realistic goal and is counter productive to the City's efforts to encourage housing. The City believes a realistic allocation would be between 400 and 640 units. The City provided inventory of available sites for housing development, housing growth trends, open space restrictions in North La Verne, rezoning and intensification efforts.

**Staff Presentation**

Ms. Elizabeth Delgado, Associate Regional Planner, stated that staff recommends that the Board deny the revision for the City of La Verne based on the following factors: 1) the City of La Verne participated in the RHNA Subregional Workshops. At the conclusion of the workshops, new local input was further analyzed and there was a reduction from 2,484 units to 897 units, resulting in the draft RHNA allocation that is consistent with trend analysis. 2) The open space that was accounted for is provided in the analysis by staff and has been accounted for within the initial AB 2158 factor analysis. 3) Staff acknowledges the city's inventory of

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zoning changes. Ms. Delgado stated that the City did provide documentation of their intensification efforts with current land use zoning. However, it was for the period of 1997 to 2006. Consequently, this does not show the potential for increased residential development during the RHNA planning cycle.

*The Hon. Jon Edney asked for public comments for the City of La Verne. There were no comments.*

After further discussion, a **MOTION** was made by the Hon. Gil Coerper to partially approve the revision request for a reduction of 50 units, contingent upon receiving verification that the 208 acres of open space area has been permanently set aside as non-development land, and as **AMENDED** with the concurrent withdrawal of the Appeal by the applicant on record. The **MOTION** was **SECONDED** by the Hon. Carl Morehouse. **A ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

**Los Angeles County – No  
Orange County – Yes  
Riverside County – Yes  
San Bernardino County – No  
Ventura County – Yes  
Imperial County – Yes**

**Motion passed 4-2**

**5.1.7 City of Pasadena**

**Revision requesting no net change in its draft RHNA due to reallocation of successfully appealed units.**

Bill Trimble, representing the City of Pasadena, stated that the intent of Pasadena's revision request was to provide maximum flexibility for both the Board and SCAG staff. Mr. Trimble explained that at the time of the appeal, SB12 had not been adopted, and the outcome of the legislation was uncertain. Mr. Trimble stated there is strong evidence that SCAG staff misunderstood the flexibility that was built into Pasadena's request. He stated that the week following submittals of both revision and appeal requests, SCAG staff posted on their website a matrix showing the requests from all jurisdictions. For the City of Pasadena, the matrix incorrectly stated "no reallocation". The matrix should have read "no net

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change”, as a result of reallocation. Mr. Trimble stated that the misunderstanding was perpetuated in the staff report, which suggests that the word “net” was not considered. Mr. Trimble further explained that as a result of delegation, Pasadena has slightly over one-half of one percent of the total units that are in play with the reduced RHNA. Whatever final reallocation may be assigned to the City, an equal number would be subtracted prior to that, resulting in no net change. This issue was not addressed in the staff report. The staff report incorrectly states that there was no documentation. The documentation was Attachment B, prepared by staff and incorporated into the resolution adopted by the Regional Council and recommended by CEHD on February 1, 2007. The City of Pasadena fully agrees with staff’s preparation of Attachment B and with the Regional Council’s adoption. There was an appropriate jobs-housing relationship in the draft set of numbers. The appropriate jobs-housing relationship was based upon a reasonable, accurate and appropriate forecast of employment for the City of Pasadena, which is also affirmed in Attachment B. The report indicates that Pasadena did not object, during the workshop process, to the numbers proposed through 2014. Pasadena believed the numbers were appropriate and accurate. It is only now, with the potential of additional units being added back in, that Pasadena is concerned about an inappropriate jobs-housing balance. Mr. Trimble further stated that Pasadena is in uncharted territory with the integration of the socio-economic forecast for the RTP with the RHNA. Pasadena has new issues to address and one of them is the relationship between employment and housing. For that reason, Pasadena contends that staff’s initial analysis represented in the adopted resolution on October 1, 2006 is accurate. Pasadena believes that the original draft forecast was appropriate. Since the end of the last RHNA, Pasadena has issued permits for about 1,400 units, more than a quarter of which are designated as affordable units. Mr. Trimble stated that Pasadena is committed to carrying their share, and is not asking for a reduction in the final number. Pasadena’s request is for a reduction that results in “no net change”.

Staff Presentation

Joe Carreras, Program Manager, stated that staff agrees that successfully appealed units must be reallocated. However, the City of Pasadena requests a post-reallocation policy adjustment of no net change. This is not a policy adopted by the Regional Council or a methodology approved for use in the Regional Needs Assessment. As an option, SCAG notes in the staff report that successfully appealed units are also subject to

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alternative distribution when two or more jurisdictions can agree on a mutually beneficial distribution, which takes into account a better jobs-housing relationship. Mr. Carreras further stated that a potential reallocation of appealed units would be in a percentage range that would not lead to an inappropriate jobs-housing relationship, since it is scaled to be in proportion to a jurisdiction's share of housing need in the region. Therefore, staff's recommendation is to deny the City's request for no net change in its assignment of future housing need, because such a post reallocation adjustment is not provided for in the adopted Regional Council methodology. Mr. Carreras also stated the City failed to show how the reallocation of successfully appealed units would lead to an inappropriate jobs-housing relationship.

City Rebuttal

Mr. Trimble stated that the City of Pasadena does not believe this is a policy issue. The City is not asking for a policy change, but rather an arithmetic adjustment. Mr. Trimble requested that the Board hold its decision on Pasadena until May 10, 2007, when all the numbers are in. At that time, an appropriate calculation can be made.

Staff Rebuttal

Ms. Lynn Harris, Manager of Community Development, stated that this issue was addressed in the staff report, wherein she cited Government Code Section 65584.05 (g).

Ms. Africa stated that it appeared Mr. Trimble is not arguing that Pasadena not be subject to reallocation. She noted that Pasadena's revision request is based on the job-housing balance factor. It appears he is arguing that by "no net change", the reallocation should be consistent with the assumptions regarding jobs-housing balance factor that was part of the methodology, and that same assumption will be applied for the purpose of reallocation. Mr. Carreras has indicated as part of his analysis, assuming there is a reallocation, that it would not be inconsistent with the assumptions for jobs-housing balance as applied to the City of Pasadena.

The Board's legal counsel, Jeff Margulies, stated that State law does not allow for a revision after allocation. He stated that the legislature set up a process so that when you consider the appeals, every jurisdiction has to share in reallocating the appeals, even the jurisdictions that had appeals granted. He noted that while Pasadena may have a concern, every

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jurisdiction has the same concern, and the legislature says you must reallocate proportionally. Mr. Margulies indicated that legally there is no mechanism to do what the City of Pasadena is asking.

*The Hon. Jon Edney asked for public comments for the City of Pasadena. There were no comments.*

After further discussion, a **MOTION** was made by the Hon. Carl Morehouse to deny the revision request and support staff's recommendation. The **MOTION** was **SECONDED** by the Hon. Gil Coerper. **A ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

**Los Angeles County – Yes  
Orange County – Yes  
Riverside County – Yes  
San Bernardino County – Yes  
Ventura County – Yes  
Imperial County – Yes**

**Motion passed 6-0**

**5.1.4 City of La Habra Heights**

**Revision request to reduce draft RHNA allocation by 45% (39 units)**

Stan Carroll, Vice-Mayor, introduced Ron Bates, City Manager. Mr. Bates stated that the La Habra Heights revision request is based on AB 2158, i.e. infrastructure constraints for additional development, such as no sewer and costly foundations; and lands protected from urban development under existing Federal or State programs. Mr. Bates also stated that he will address high-housing cost burdens; and the availability of land suitable for urban development or conversion to residential use. Mr. Bates stated there was an issue involving Puente Hills Habitat Authority that was not clearly identified on the initial maps presented to SCAG. Mr. Bates referenced several parcels including earthquake zones and steep slopes in excess of 25%. These parcels would be extremely difficult and costly to develop. Basic foundation and septic costs would be extremely high, which would preclude any low-income or multiple-family development. In summary, Mr. Bates stated that a fair adjudication under AB 2158 for the City of La Habra Heights would be 63 units.



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Staff Presentation

Ma'Ayn Johnson, Associate Regional Planner, recommended that the Board deny the revision for the City of La Habra Heights. Ms. Johnson stated that the input received from the workshops was taken into consideration and analyzed by staff. This information was applied to the forecast, which resulted in a 70% reduction from the preliminary allocation to the draft allocation. Ms. Johnson further stated that the Puente Hills Preserve, earthquake zones, and steep faults were also taken into consideration.

City Rebuttal

Sandi Levin, La Habra Heights City Attorney, argued that the factors addressed by Ms. Johnson were not adequately considered in the preliminary reduction, and the remaining space available is not suitable for 116 units. She reiterated that these are extremely steep properties with severe constraints and safety issues involving fire, landslides, and ground instability. Ms. Levin stated that there is only a small portion of the city that is suitable for housing development.

Howard Vipperman, Council Member, pointed out that the City of La Habra Heights has only one business. The second highest employer is the City, which employs approximately 15 people. Consequently, La Habra Heights is not driven by housing demands to meet the job market. Council Member Vipperman also pointed out that the City's population is decreasing.

*The Hon. Jon Edney asked for public comments for the City of La Habra Heights. There were no comments.*

A **MOTION** was made by the Hon. Gil Coerper to continue this matter until the afternoon session to give staff the opportunity to reanalyze the maps and consider new input provided by the City. The **MOTION** was **SECONDED** by the Hon. Charles White and **UNANIMOUSLY APPROVED**.

Hon. Jon Edney stated that this item will be first on the agenda after the lunch break. Hon. Edney provided a directive on the continuance of this item. Staff will have 3 to 5 minutes to present any additional information, the City will have 3 minutes to respond, and then it will be brought back to the Board for a decision.

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**5.1.9 City of Duarte**

Revision request to reduce draft RHNA allocation by 11.5% (49 units)

Jason Golding, Senior Planner, stated that the City is requesting a reduction of its entire 63 units, based on the City's documented decrease in land available for development due to protected programs for open space and slope issues.

*The Hon. Jon Edney asked for public comments for the City of Duarte. There were no comments.*

A **MOTION** was made by the Hon. Gil Coerper to approve the reduction of 63 units, and as **AMENDED** with the concurrent dismissal of the Appeal, with the agreement of the applicant on record. The **MOTION** was **SECONDED** by the Hon. Charles White. A **ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

**Los Angeles County – Yes  
Orange County – Yes  
Riverside County – Yes  
San Bernardino County – Yes  
Ventura County – Yes  
Imperial County – Yes**

**Motion passed 6-0**

**5.2 OPEN PUBLIC HEARING:  
Consideration of Appeal Requests**

*The Hon. Jon Edney asked for public comments. There were no comments.*

The Board's legal counsel, Jeff Margulies, stated the distinction between revisions and appeals. Mr. Margulies stated that the distinction is drawn in the context of the AB 2158 factors. On a revision, the Board is free to reconsider the initial determination of the draft allocation. On an appeal, the burden of the applicant is to demonstrate that staff failed to consider certain factors. Mr. Margulies went on to explain that as an appellant Board, there is presumption of correctness that the applicant needs to overcome and demonstrate that staff did not consider certain information.

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**5.2.8 City of Bellflower**

**Appeal request seeking an unspecified reduction of the City's RHNA allocation.**

Brian Lee, Director of Community Development, stated that the City's appeal is based on fairness in the allocation numbers. Mr. Lee stated that Bellflower is an old community, approximately 6 1/2 square miles in size, with a population 78,000. He explained that Bellflower has no growth potential, no open space, no hillsides, and no environmentally protected zones. In order for Bellflower to build more affordable housing, the City would have to pay market price to acquire existing housing, demolish the structures, and build new housing at a higher density. The average parcel size is under an acre, approximately 10,000 to 15,000 square feet. In order to create any type of affordable housing product, these parcels would have to be combined. The City has been averaging an increase of approximately 35 units per year over the past 10 years. With zoning incentives and use of affordable housing money, it might be possible to increase that to 50 units per year. The City has made a significant effort to provide affordable housing stock to the region. The City has a substantial number of mobile home parks that provide affordable housing, as well as many apartments, duplexes, and triplexes. Mr. Lee stated that one of the City's significant challenges is eliminating un-permitted housing that occurs in garages and storage sheds. Mr. Lee said that Bellflower participated in the Subregional Workshops; however, the data the City submitted was misplaced. Staff assured the City that their numbers were taken into consideration. Mr. Lee stated that he is skeptical because other cities that participated in those same workshops received reductions in their number, but Bellflower did not. Mr. Lee also said that if affordable housing is a regional problem, it should have a regional solution. He pointed out that Bellflower shares a common boundary with a sister city to the east and their affordable housing obligation is less than 100. He believes it defies logic that the need for affordable housing decreases ten-fold as you head east over the San Gabriel River. This particular city has 3 times more land area than Bellflower and also has significant growth areas. From a municipal perspective, Bellflower is looking for a reduction of 25% (265 units) in our RHNA allocation.

**Staff Presentation**

Peter Brandenburg, Senior Regional Planner, stated that the City's written appeal proposal did not contain a specific allocation number. Their written appeal was based on all three of the available bases; methodology,

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AB 2158 factors, and changed circumstances. Mr. Brandenburg said it was staff's determination that the information and documentation submitted was not sufficient to support a reduction to their draft allocation. The City stated that it had a number of mobile home parks and other affordable housing stock and that this should change the amount of affordable housing required under the allocation. They also stated that these mobile home park units, approximately 1,500 units, were unreported and not counted in their RHNA calculation. Mr. Brandenburg stated that in fact the mobile home units were included in the Department of Finance data that was used to arrive at the RHNA base year figures. Mr. Brandenburg further stated that under the AB 2158 factors, Bellflower submitted a list of public and private lands, right-of-ways, and flood zones encompassing 246 acres that are unavailable for residential development. However, they made no argument as to what portion of the city's land area those 246 acres would make up, nor did they look at the remaining acreage in the city and how that acreage might be redeveloped at alternative densities to allow for 1,058 housing units. Finally, under lands protected from urban development, there may be lands within the city that are unbuildable for various legal reasons, but they provided no documentation of any lands that are protected by State or Federal programs designed to protect open space, farmland, environmental habitats or natural resources.

City Rebuttal

Mr. Lee stated that an important distinction is that in the census numbers the State counts mobile home parks as housing, but not necessarily as affordable housing. Mr. Lee explained that Bellflower's mobile home parks are not typical mobile home parks. They are in essence travel-trailer parks that morphed over time into permanent housing. He pointed out that many of them are just travel-trailers, vans, and RVs. Consequently, the term mobile home park is misleading in that it conjures up a vision of conventional mobile home parks, which are quite nice with plenty of home space and amenities. Bellflower's mobile home parks are not that. They are housing of last resort. They are termed mobile home parks because they fit HCD's definition. In summary, Mr. Lee believes that Bellflower is being unfairly punished with this housing allocation.

Staff Rebuttal

Joe Carreras, Program Manager, pointed out that staff did not know until today that Bellflower is requesting a 25% reduction, and staff was given no rationale as to what this number is based on. Also, from a socio-equity

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standpoint, the Regional Council has adopted a strong 110% socio-equity policy, which benefits communities like Bellflower. The housing need allocation, because of the 110% adjustment, weighs much more toward market rate housing need, as opposed to affordable housing need, as identified by Mr. Lee.

The Hon. White asked staff about the lost data that Mr. Lee referred to in his presentation. Hon. White asked if the lost data was considered in the basis of their appeal.

Peter Brandenburg, Senior Regional Planner, stated that after the Gateway Cities Subregional Integrated Growth Forecast Workshop, some of the maps were lost. The information that was lost was based on the 2035 test scenario, which did not influence staff's RHNA allocation calculations. Also, Mr. Brandenburg pointed out that staff still had all the written text, and with the City's help, staff was able to reconstruct the data for the maps.

*The Hon. Jon Edney asked for public comments for the City of Bellflower. There were no comments.*

After further discussion, a **MOTION** was made by the Hon. Tim Jasper to deny the appeal request and support staff's recommendation. The **MOTION** was **SECONDED** by the Hon. Carl Morehouse. **A ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

**Los Angeles County – Yes**  
**Orange County – Yes**  
**Riverside County – Yes**  
**San Bernardino County – Yes**  
**Ventura County – Yes**  
**Imperial County – Yes**

**Motion passed 6-0**

**5.2.9 City of Paramount**

Appeal request seeking an unspecified reduction of the City's RHNA allocation.

Marc Blodgett, representing the City of Paramount, stated that Paramount is a small city, approximately 4.8 square miles, and was part of the post-

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war building boom that occurred in Southern California. The majority of Paramount's development took place in the 1950's and 1960's. In 1970, Paramount was listed among other suburban communities as areas in crisis. Since 1970, over 3,000 housing units have been constructed in a city that was already fully developed. High-density, owner-occupied, affordable housing was constructed along Paramount Avenue. At the same time, single-family neighborhoods that were in decline were upgraded and revitalized. The socio-economics and the ethnicity of the community are similar to that of Bellflower and Compton. The original RHNA allocation for Paramount was 1,309, and was subsequently reduced to 1,008 units. Paramount provided information indicating that over 56% of the land area is already developed as residential, the balance includes freeway right-of-ways, the Los Angeles River channel, two utility line easements, commercial property along the major arterial roadways that also include residential in-field development. Mr. Blodgett stated that it would require 46 acres of land to accommodate the RHNA allocation at the highest density that the City's current General Plan permits, which is well over the 22 units that the State requires. Mr. Blodgett further stated that he has completed General Plans and housing elements for approximately 50 cities. These production targets are being taken very seriously. The City must identify specific parcels, insure there is infrastructure, and notify the HCD to insure financing. It would require the City to provide over a 100 units a year to meet the RHNA allocation of 1,008 units for the next eight years. In the last 37 years, the City has provided 3,000 units, at tremendous cost to the City.

Mr. Joe Perez, Director of Community Development, stated that Paramount's RHNA allocation for the prior housing element period was 144 units, which represents a 600% increase. Mr. Perez restated that Paramount is completely built-out and does not have available land. Paramount is requesting 144 units as their RHNA allocation.

Staff Presentation

Ms. Pria Hidisyan, Associate Regional Planner, stated that SCAG received Paramount's Appeal based on four AB2158 factors. They provided no specific number for their allocation request until today. Ms. Hidisyan addressed the four AB 2158 factors; 1) Existing or projected job-housing balance; Paramount stated that in order to provide additional residential development, they would need to eliminate 47 acres of commercial or industrial land. That claim was based on a voter-initiated measure, which

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set a certain zoning number within the City, and based on AB 2158 factors, that it not a justification for a reduction. 2A) Infrastructure constraints; the City did not provide any evidence that the lack of capacity for sewer or water service would be due to Federal or State laws. 2B) Availability of land suitable for development or conversion; the City maintained its voter initiated measure, which staff cannot use for justification for such a determination. Also, they did not provide any documentation of an inability to convert other lands to residential. 3) The distribution of household growth assumed for regional transportation planning; the City noted there would be additional vehicle trips based on an increase in housing. They did not provide any justification for how the assignment of household growth was inconsistent with long range growth forecast for regional transportation planning.

City Rebuttal

Mr. Blodgett responded to all four points, starting with the job-housing balance issue. He explained that the reference to the voter-initiative is not relevant to the information we provided. Mr. Blodgett stated that the relevant information provided to staff was a vacant land inventory that was done for the housing element. The housing element is certified by HCD. Paramount would have to remove active employment facilities, both commercial and industrial, to accommodate the 46 acres. This would put the City in a situation of being job rich and housing poor. Regarding the infrastructure constraints, Mr. Blodgett explained that most of the residential neighborhoods and the areas behind the major arterials have 4 to 6 inch water lines that were constructed over 20 years ago. The major infrastructure is in the major arterial roadways where there is currently an abundance of higher density multiple family housing. The City was informed by Public Works' officials that there was not sufficient reservoir capacity to deal with another 200,000 gallons of water a day. The City would have to upgrade its facilities. In terms of availability of land, there is no vacant land in the City. The City is fully urban and has been for over 50 years. As part of the City's current General Plan update, they are being very generous in allowing mixed use development in commercial zones. In every commercial zone, you can build mixed use development, which is unique in Southern California. Finally, the relationship of the City's growth to the RTP, the City looked at local streets and believed this allocation would increase travel volumes on major arterials by approximately 6,000 vehicles per day at certain intersections. These intersections are already operating at capacity. The 105 and 710 Freeways

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border our city, and we have a light-rail line that runs down the Century Freeway, but there are no stops in Paramount. Also, there are other concerns in the legislation. Assembly bills have been introduced that would financially penalize individual jurisdictions on a per unit basis for their unmet RHNA. The housing crisis is real, and the City of Paramount has done a good job in the region of meeting its requirements.

**SCAG Rebuttal**

Ms. Harris stated that staff made reference to the City's voter-initiated proposition that limits density to 22 units per acre because we are not allowed to consider whether or not there is a voter initiated proposition in the City with respect to their ability to meet housing need. Ms. Harris also stated that the availability of land is not what the requirement is in terms of implementing the housing need, it is the ability of the City to make sites available and sites are not necessarily vacant land. Ms. Harris stated that while the vacant land inventory is relative, it is not the only factor. Ms. Harris addressed Mr. Blodgett's comparison to the last RHNA period, in which their allocation was 144 units. Ms. Harris emphasized that this RHNA period was only for 5 years, and even if it were extrapolated to 8 ½ years, the last RHNA process was not an integrated forecast with a growth forecast like this one. She further pointed out that in developing the RHNA numbers, staff used the growth population and employment forecast.

*The Hon. Jon Edney asked for public comments for the City of Paramount. There were no comments.*

The Hon. Carl Morehouse requested clarification how Paramount's allocation numbers were determined. Frank Wen, Program Manager, explained that each local jurisdiction's growth was arrived at according to its historical trend and the share of the county level growth. Mr. Wen explained that not only did staff look at the jurisdiction's individual historical growth, but they also looked at the City's share of the county and regional level growth. In the last RHNA period, because we had just come out of a recession, the projected growth for the last RHNA period is very low. This translates to a lower county level growth, and the city level share of the county level is low. For this RHNA period, we see a tremendous growth in the last few years. This translates to a much higher growth in the future.



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A **MOTION** was made by the Hon. Gil Coerper to deny the appeal request and support staff's recommendation. The **MOTION** was **SECONDED** by the Hon. Charles White. **A ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

**Los Angeles County – Yes  
Orange County – Yes  
Riverside County – Yes  
San Bernardino County – Yes  
Ventura County – Yes  
Imperial County – Yes**

**Motion passed 6-0**

5.2.7 West Hollywood  
Appeal request for an unspecified reduction  
of the City's RHNA Allocation

Susan Healy Keene, Community Development Director, stated that the City is appealing the allocation of 579 units based on two AB 2158 factors; 1) availability of land suitable for urban development or for conversion to residential use; and 2) distribution of household growth assumed for purposes of comparable regional transportation plans. Ms. Keene stated that West Hollywood is a high-density, 1.9 square mile city. She pointed out that the City has the highest housing density of all the Westside Cities, and there are no plans for future rail transit. Ms. Keene stated that this presents an inequity of the proposed RHNA allocation relative to other Westside cities. She stated that only one other city in the subregion has a higher allocation. Ms. Keene stated that the majority of West Hollywood is zoned for multi-family residential development, and the City has been a leader in affordable housing. Ms. Keene further stated that West Hollywood's RHNA allocation should be reduced until a greater share of regional transit can be provided to the City.

Staff Presentation

Pria Hidisyan, Associate Regional Planner, stated that the City of West Hollywood participated in the Subregional Workshop for the Westside Cities, and provided input regarding their preliminary housing need allocation. Ms. Hidisyan stated that their input was reviewed and evaluated. Staff did not believe that any adjustments were justified on the basis of this input.

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City Rebuttal

Francie Stefan, representing West Hollywood, stated that West Hollywood's existing population density is approximately three times that of two other similarly populated Westside Cities and nearly double that of Santa Monica. Ms. Stefan stated that West Hollywood's ratio of jobs to housing is well-balanced at 1.29, which demonstrates that West Hollywood is dedicated to providing housing in close proximity to employment. She further stated that despite these facts, West Hollywood experiences the highest levels of traffic congestion. Ms. Stefan reiterated that until additional high-capacity transit service is provided to West Hollywood, the RHNA allocation should be lowered.

*The Hon. Jon Edney asked for public comments for the City of West Hollywood. There were no comments.*

A **MOTION** was made by the Hon. Jon Edney to direct staff to review AB 2158 factors based on the City's transportation and land availability concerns. The **MOTION** was **SECONDED** by the Hon. Charles White and **UNANIMOUSLY APPROVED**.

The Hon. Edney stated that the Board will reconvene on this matter today after lunch.

## **5.1 Consideration of Revision Requests**

### **5.1.4 La Habra Heights (Continued)**

Staff Presentation of New Findings

Mark Butala, Program Manager, stated that he had reviewed the maps in more detail and reported that the City's first draft was the actual representation of the City's General Plan, which for the most part was agricultural residential throughout the city. It may not be entirely accurate, but accurate enough for planning purposes. Mr. Butala stated that what the City submitted as their second draft was actually the test scenario that was presented at the Subregional Workshop. Staff received input from the City during that workshop and then the City submitted 3<sup>rd</sup> and 4<sup>th</sup> maps that included the Puente Hill Habitat Preserve and the Alquist Priolo Fault Zone, all of which were analyzed and incorporated into the staff report. Staff did not see any information contrary to what was originally submitted to recommend any additional reduction. Mr.

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Butala stated that in regard to availability of land suited for urban development, he would address two major factors: 1) The Alquist Priolo Fault Zone; Mr. Butala stated that after the workshop there were still some residential units allocated to this fault zone area. However, this area is at a reasonably low density, one unit per acre, which staff believes is consistent with city zoning and based on that factor, staff does not recommend any further reduction. 2) Steep slopes; Mr. Butala stated that after the workshop, there were still some housing units allocated on these steep slopes, but at a density of one housing unit per two acres. Staff believes this is reasonable and does not recommend any further reduction. The final factor is Lands Protected from Urban Development under Existing Federal or State Programs. After consideration of input from the workshop, staff allocated 37 units or one unit per two acres in this protected area. Mr. Butala stated that with verification that this land is protected under a State or Federal program, staff could support a reduction of up to 37 units in this preserve area through the year 2014.

City Presentation

Sandi Levin, representing La Habra Heights, addressed the Habitat Authority issue and stated that it is a JPA formed under State law and authorized under State law in the Public Resources Code. This is a State Law Protected Area and no development can take place within the Habitat Authority. We believe a reduction of 37 units would be appropriate.

*The Hon. Jon Edney asked for public comments for the City of La Habra Heights. There were no comments.*

The Hon. Jon Edney brought the matter back to the Board, and stated that based on staff's presentation, he would recommend changing the number from 116 units to 79 units.

A **MOTION** was made by the Hon. Paul Nowatka to approve the revision from 116 units to 79 units, contingent upon receiving verification that the Habitat Authority has been permanently set aside as non-development land, and to accept staff's recommendation on the infrastructure factor.

The **MOTION** was **SECONDED** by the Hon. Charles White. A **ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

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Orange County – Yes  
Riverside County – Yes  
San Bernardino County – Yes  
Ventura County – Yes  
Imperial County – Yes

**Motion passed 6-0**

**5.1.1 City of South Pasadena**

**Revision request to reduce draft RHNA allocation by 4 % (6 units)**

David Watkins, Director of Planning and Building, stated that the basis for the City's request is a growing portion of self-employment is being absorbed by home occupations, which has more than doubled between 2000 and 2005. Those home occupation jobs are not creating demand for extra housing; consequently, the City is requesting a reduction to reflect the home occupation permits. Mr. Watkins stated that for the methodology, the City did not assume any continued growth in home occupation permits, but used the 2005 percentage of self-employment and extrapolated that to the RHNA period to preserve the existing jobs-housing relationship.

*The Hon. Jon Edney asked for public comments for the City of South Pasadena. There were no comments.*

**Staff Presentation Waived**

A **MOTION** was made by the Hon. Paul Nowatka to support staff's recommendation and approve the revision from 171 units to 165 units. The **MOTION** was **SECONDED** by the Hon. Gil Coerper. A **ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

Los Angeles County – Yes  
Orange County – Yes  
Riverside County – Yes  
San Bernardino County – Yes  
Ventura County – Yes  
Imperial County – Yes

**Motion passed 6-0**

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**5.1.3 City of El Monte**

**Revision request to reduce draft RHNA allocation by 45% (977 units)**

Minh Thai, representing the City of El Monte, stated that the City requests a growth forecast that is reflective of what they are able to accommodate based on local constraints, as well as what is anticipated for the General Plan, which is approximately 2,000 units. Mr. Thai stated that in looking at past housing production trends and the growth constraints in the area, El Monte could accommodate 152 units per year, based on the past household growth production trend. Mr. Thai stated that in looking at future trends and what El Monte has produced over the past years, we are facing a situation where we have less land availability for additional housing production. The City believes it has the capability to produce 152 units per year, and based on the next RHNA allocation plan, the City would be able to accommodate approximately 1,200 units per year. Mr. Thai stated that the City believes this is an appropriate growth rate considering the General Plan projection, as well as the City's growth ability.

**Staff Presentation**

Ms. Delgado, Associate Regional Planner, stated that staff recommends denial of the City's revision request. The staff recommendation is based on the following: 1) El Monte participated in and provided input to the Subregional Workshop. This information was analyzed and there was an 18% reduction made, as a result of this input. 2) from this information and the AB 2158 factors that the City cited as their reasoning for the revision, the City failed to provide adequate documentation to exclude housing growth opportunities, increased residential densities under alternate zoning ordinances, and the opportunity to maximize the use of public transportation and existing transportation infrastructure. The City of El Monte is located in a crucial part of the City, and is a nucleus for freeways and public transportation. 3) the City failed to provide basis for suspending application of the RHNA methodology regarding income category distribution or releasing the City from its statutory responsibility regarding the income distribution, which was cited in their request.

**City Rebuttal**

Mr. Thai stated that in terms of the City's proximity to transportation and freeway access, it does create opportunities for the City to look at mixed use or TOD developments, which would enhance the ability to accommodate housing units. The City is in the process of considering a

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TOD project near the El Monte Bus Way, which would accommodate additional housing and jobs. The impact that goes with those additional types of growth has not been evaluated. Mr. Thai stated that El Monte has one of the lowest open space ratios in the country, with an average of .5 acres per thousand residents. The City has recently adopted a goal of providing 3 acres per thousand, which would bring the City closer to the State's average, as well as the nation's average. El Monte wants to improve the quality of life by providing additional open space and good housing opportunities.

*The Hon. Jon Edney asked for public comments for the City of El Monte. There were no comments.*

The Hon. Jon Edney brought the matter back to the Board. A **MOTION** was made by the Hon. Larry McCallon to deny the revision request and support staff's recommendation. The **MOTION** was **SECONDED** by the Hon. Charles White. A **ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

**Los Angeles County – Yes  
Orange County – Yes  
Riverside County – Yes  
San Bernardino County – Yes  
Ventura County – Yes  
Imperial County – Yes**

**Motion passed 6-0**

5.1.6 City of La Mirada  
Revision request to reduce draft RHNA allocation by 72%  
to 83% (300 – 490 units)

Reuben Arceo, City Planner for the City of La Mirada, stated that information presented in the packet from 2003 is erroneous and was provided by a City Planner who is no longer with the City. That information was used to draw these projections. Based on a correct household projection, the City recommends 300 – 490 units.

Marc Blodgett, representing the City of La Mirada, stated that he is alarmed at the high number of the allocation because the City of La

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Mirada is fully developed. He stated that it is not possible for the City to implement these quantified objectives.

Jim Markman, City Attorney for the City of La Mirada, stated that the genesis of this process was based on a mistake wherein two incorrect digits were put into a form sent to SCAG in 2003. Mr. Markman stated that the City has hired experts and done everything possible to get staff to look at the accurate projections. Mr. Markman believes that one of the reasons for the allocation in the staff report is that there are no constraints on the open space being converted to housing. The 492 acres of open space consists of a cemetery, a county park, a county golf course, and parks paid for with bond proceeds, none of which are convertible. Mr. Markman stated that La Mirada staff informed SCAG that the City would withdraw the appeal if there could be an accommodation on the 900 units. He stated if that is not possible, then the City requests an explanation of these numbers from staff.

Staff Presentation

Pria Hidisyan, Associate Regional Planner, stated that the City of La Mirada is requesting both a revision and an appeal. The issue of the error for the growth forecast would fall under the appeal because that is based on methodology. Ms. Hidisyan stated that she would address the AB 2158 factors, which applies to the revision. The City provided staff with a range of their requested allocation, which is between 300 – 490 units, or a reduction of between 72% and 83%. City representatives met with staff several times and the City was granted a 36% reduction. Ms. Hidisyan addressed the three AB 2158 factors; 1) Water and sewer infrastructure constraints; the City did not provide any documentation that this lack of capacity was based on any Federal or State laws or regulations that would preclude the supply and distribution of water and sewer infrastructure. For this reason, staff was not able to justify a reduction. 2) Availability of land for urban development or conversion; the City did not provide any documentation that these areas were unsuitable for conversion or additional density. Mr. Hidisyan stated that one of the studies provided by the City showed that with rezoning, the City could generate an additional 800 units. 3) The lands preserved or protected under existing Federal or State programs; the City does have 492 acres of parks and recreation and open space in their General Plan; however, they did not provide any documentation that these lands are preserved or protected based on existing Federal or State programs.

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Ms. Harris, Manager of Community Development, clarified that the range of 900 – 2700 units used in the development of the allocation figure for La Mirada was not generated by staff. The 900 number was the City's proposal of what they thought would be acceptable from their standpoint.

The Board's legal counsel, Jeff Margulies, requested that Mr. Markman clarify whether the City contends that the miscount or misinformation is germane to the revision request for the appeal.

City Rebuttal

Mr. Markman stated that he was not aware until today that there were two separate processes, but if it requires consideration of the appeal to deal with the methodology, then Mr. Markman noted for the record that the City would like to proceed with the appeal. Mr. Markman stated that in regard to two of the three restraint issues, he is certain that it is State law that open space in La Mirada cannot be converted to residential use, without going through an election process. Mr. Markman further stated that regarding the soils issue, staff states that the City did not provide documentation addressing the soil issue, when in fact the City submitted a consultant's report addressing technical information on the liquefaction soil issue, and the capacity of water and sewer lines to handle the extra flow that housing would create.

In response to staff's assertion that sufficient documentation was not provided, Mark Blodgett stated that the City provided a detailed inventory of land use in the City showing development and growth trends, as well as aeriels, maps and exhibits, which indicate that the majority of the City is developed as residential. Mr. Blodgett stated that he would be happy to meet with staff to ascertain what documentation is still needed. Mr. Blodgett restated that it is next to impossible for such a small city to provide 1,700 new housing units, 250 units per year, over the next 8 1/2 years.

*The Hon. Jon Edney asked for public comments for the City of La Mirada. There were no comments.*

The Hon. Edney brought the matter back to the Board. The Hon. Larry McCallon reviewed the three factors that the revision request is based on. 1) Water/sewer structure constraints; the City has stated that there are existing capacity issues, but the City has not said they cannot increase the



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capacity to accommodate the additional housing. There is nothing precluding them from increasing that capacity. 2) Availability of land; The Hon. McCallon stated that as staff pointed out, their engineering consultant reported that by rezoning, they could generate almost 900 additional housing units. 3) Land preservation; staff stated that the 492 acres was considered in developing the draft allocation, and staff has not received any documentation stating that this land is protected under existing Federal and State programs.

Staff's legal counsel, Joanna Africa, stated for clarification that the specific factor states that it is protected under existing Federal or State programs, not Federal or State law. The Board's legal counsel, Jeff Margulies, stated that Government code (d) (2) (c) does limit the condition to Federal or State programs. However, Government code (d) (2) (b) indicates that the Board can base its decision on the availability of land suitable for urban development or conversion to residential use. It also states that the Board cannot limit its consideration to zoning ordinances and land use restrictions of a locality. Mr. Margulies indicated that his concern is that if the applicant is stating that under State law they are prohibited from using this open space, this may present a conflict that the Board would need to address.

Mr. Blodgett stated that the 492 acres includes city parks, a county open space facility, and a cemetery, and these are not suitable sites for in-field housing. Mr. Blodgett indicated that the General Plan of the State of California has a 30 year history. The Assembly and the Legislature would argue that the 40-plus years of litigation and court cases, as well as the supporting legislation, would say that any process that is undertaken, should not remove the ability of local governments to control land uses in their city, whether it be zoning or General Plan.

Staff Rebuttal

Frank Wen, Program Manager, stated that the methodology is based on the local jurisdiction review and comment process, and what kind of growth they can accommodate. We based the prior reduction on this information. This new information regarding the open space was not used to determine the construction needs of the City.

The Hon. Jon Edney, stated that in regard to Mr. Markman's suggestion that the Board always follows staff's recommendation, he wanted to make

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clear that the Board looks at all the facts and gives equal opportunity to each jurisdiction to present its case. He further stated that the process will show that the Board has been very open-minded in working through these appeals and revisions and making a fair decision. Hon Edney stated that under the statute and under the policy that has been adopted, the Board cannot consider local zoning or local voter approved plans in regard to the RHNA. Hon. Edney requested that staff provide more information directly related to the liquefaction issue to determine how staff assessed this issue in regard to those areas.

Staff Presentation

Pria Hidsiyan, Associate Regional Planner, stated that the City did provide maps of their liquefaction areas and noted where they already have residential neighborhoods in these areas. Mr. Hidsiyan stated that while it may be a new policy for the City's General Plan not to go into these areas, there are existing residential communities in these zones. La Mirada did not provide staff with any understanding of why other parts of the city could not be converted to residential use where zoning could be changed in order to accommodate more housing. In terms of additional housing referred to in the APA Engineering Report, it basically notes four study sites, and within those four study sites, it indicates that by rezoning, 895 additional units could be provided.

Mr. Arceo referred the Board to a City map showing a liquefaction area called the Foster Park area. Mr. Arceo explained that this area was annexed by the City of La Mirada in the 1970's.

Hon. Edney referred to a letter sent to SCAG by the City wherein it addresses issues that cannot be considered by the Board. The City states that currently there is only one site suitable for the development of residential units. Hon. Edney said this does not address all the factors such as increased density and modifying existing zoning uses. The Board cannot base a decision on current zoning or on the City's General Plan or on the desires of the residents in the community. Hon. Edney stated there are alternatives to providing your housing number. It is not about converting commercial or industrial land to residential units, and it is not about having no vacant land. Those are all criteria that we are not allowed to use to establish the number. We have to use what the growth forecast is and we have to use the fact that local zoning and planning initiatives do

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not have a say. The Hon. Edney requested further comment from the Board or a motion.

A **MOTION** was made by the Hon. Larry McCallon to deny the revision request. The **MOTION** was **SECONDED** by the Hon. Gil Goerper. A **ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

**Los Angeles County – Yes  
Orange County – Yes  
Riverside County – Yes  
San Bernardino County – Yes  
Ventura County – Yes  
Imperial County – Yes**

**Motion passed 6-0**

**5.1.5 City of San Marino**

**Revision request to reduce draft RHNA allocation by 92% (24 units)**

David Saldana, representing the City of San Marino, stated that San Marino is a very unique community, which has approximately 3.75 square miles of land and has a population of approximately 13,000. The City is surrounded by the City of Pasadena to the North, South Pasadena to the West, San Gabriel to the South, and unincorporated Los Angeles to the east. The City was incorporated in 1913, and it was the vision of the Founding Fathers to develop a single-family residential community containing “elegant homes and gardens”. The City’s first mayor was George S. Patton, Sr., father of the famous World War II General, who grew up on his father’s estate located adjacent to the now famous estate of Henry Huntington, known as the Huntington Library. San Marino is characterized by its single-family residential neighborhoods with 85% of the City’s land devoted to residential use. This is clearly the predominant land use in the City. The City has no apartments, residential condominiums, or industrial land uses. There are four distinct neighborhood commercial districts with small businesses catering to the local residents. According to the 2000 census, there were 4,437 housing units in the City, of which 96% are occupied, and 92% occupied by the property owner. Within the City there is a diversity of lot size, home size, age and style. It is a city of custom homes. There are no traditional subdivision tracts as commonly found throughout the Los Angeles region.

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A majority of the housing stock was built between 1920 and 1950. Mr. Saldana addressed the AB 2158 factors to support the City's request for revision. 1) The availability of land suitable for urban development or for conversion to residential use; the availability of under utilized land and opportunity for in-field development, and increased residential densities; In the City of San Marino there remains only one vacant residential property. According to the 2003 General Plan and the State Department of Finance, the City's housing stock has always increased in single digits. Between 1990 and 1995, the number of units increased by 5 units and 4 more between 1995 and 1999. This increase was during a time when the City was considered to be built-out. The analysis prepared by SCAG had determined that between 1998 and 2005, the fair share housing needs assessment for San Marino was zero. In the 2007 RHNA calculation, the total household growth between 2007 and 2014 was two. At the time of the analysis, the City had two vacant parcels, and last year the City issued building permits to construct a new house on one of those two. So now San Marino has one remaining vacant parcel. 2) Market demand for housing; According to the 2000 census, San Marino has a vacancy rate of 3.9%. Normal vacancy rate is between 3% and 5%. Mr. Saldana stated that through the RHNA process, SCAG is estimating a norm of 3.5% vacancy rate for the San Gabriel Valley. The current vacancy rate for San Marino suggests that families are having a difficult time finding a home within their price range. Contrary to the current market, San Marino homes sell very quickly, with sellers receiving their asking price or even more. Surveys performed during the 2003 housing element update found that a high vacancy rate suggests there may be an over supply of housing. 3) High housing cost burdens; According to the 2000 census, the median value of a home in San Marino was \$690,800, with a median mortgage of \$3,169. In comparison, a median value of a home in Los Angeles County was \$209,300, with a median mortgage of \$1,524. This means that the median priced home in San Marino in 2000 was over three times higher than a median priced home in Los Angeles County. The rents were also three times higher. Although the gap has closed since 2000, the prices of homes in San Marino remain significantly higher than the county median and are beyond affordable. According to market trends for 2006, the median value of the 161 homes sold last year was \$1.3M. In Los Angeles County, 69-plus homes sold at a median price of \$541,000. This translates that San Marino homes are selling at 2 ½ times that of Los Angeles County homes.

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Staff Presentation

Ma'Ayn Johnson, Associate Regional Planner, recommended that the Board deny the revision request of 24 units by the City of San Marino. The reason for this is due to several factors. 1) The City contends that they are built-out, but only provide information on there being only one vacant unit left in the City. The law requires that the availability of land include other alternatives to zoning, such as increased densities, in-field development, and under utilized sites. The City did not explore this, so staff cannot consider it as a reason for a revision request. 2) In terms of high housing cost burden, while the City contends that the home prices of the city are two or three times greater than Los Angeles County, this does not preclude the City's responsibility to build housing for all types of income groups, including those on the lower end of income. 3) In regard to market demand for housing, the City claims that their vacancy rate is currently at 3.9%. However, the Regional Council adopted a policy that the vacancy rate would be 3.5% applied to future housing stock, rather than existing stock.

City Rebuttal

Mr. Saldana stated that with regard to the issue of potential to increase densities in San Marino, this is something that the City looked at when they last updated the General Plan in 2003. The City looked at the land use element and mixed land use opportunities. San Marino has a major east/west arterial in San Marino called Huntington Drive, which contains three of the City's small commercial districts. These properties were looked at by a steering committee and recommended for the possibility of mixed-land use. Mr. Saldana stated that when it went before the City Council, they cited problems in regard to physical constraints relative to the size and location of these properties. These properties are only a few hundred feet deep and there is only a 20 foot alley separating them from a single-family residential area. Additionally, they looked at the possibility of sub-dividing existing lots in the City. There are few opportunities for the City to continue any further subdivision of property.

Mr. Morehouse requested clarification from staff as to how they arrived at the number of 26 units for San Marino.

Frank Wen, Program Manager, stated that the housing need for each city has three components; household growth basically accommodates the population growth, replacement needs, and vacancy. Mr. Wen explained

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that for the City of San Marino, 26 units accommodates the population growth using three persons per household projects a six person increase over the next 8 ½ years. The City tore down 24 units in the last 8 1/2 years. One unit for the vacancy allowance, which is 24 units, accommodates the replacement units. RHNA asked the City to rebuild those 24 units.

The Hon. Carl Morehouse asked the City for clarification regarding the loss of those units, and their assessment that those units do not count.

Mr. Saldana explained that the reason those units do not count is because it was the City's understanding that staff's interpretation of replacement need pertains to the replacement of deteriorated units. Mr. Saldana stated that the 24 units that staff is referring to are units that have been replaced voluntarily and have nothing to do with deterioration. There are a lot of voluntary upgrades that are taking place on a daily basis. The Hon. Morehouse asked if the City could accommodate second dwell units. Mr. Saldana replied that the City has a second unit ordinance per State law and the City has been flexible with regard to modifying that ordinance in accordance with State law. In addition, the City reduced the minimum lot size requirement for adding a second unit to an R-1 zone, which reduced the lot size from 17,000 square feet to 12,000 square feet.

**Staff Rebuttal**

Joe Carreras, Program Manager, stated that the replacement need was calculated from the data on demolition permits that is reported to the Department of Finance. In some cases, these demolition permits relate to deteriorating housing that has to be replaced. In other cases, it can be related to fire and natural disaster, or a commercial build area expanding into a residential area. It could also be related to a civic center project where housing is removed. Mr. Carreras explained that there are many factors relating to what constitutes the basis for the City supplying the State with the demolition permit information, which in turn is used to project the City's replacement need, as a component of the City's total housing need.

*The Hon. Jon Edney asked for public comments for the City of San Marino. There were no comments.*

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A **MOTION** was made by the Hon. Gil Coerper to deny the revision request. The **MOTION** was **SECONDED** by the Hon. Larry McCallon. **A ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

**Los Angeles County – Yes  
Orange County – Yes  
Riverside County – Yes  
San Bernardino County – Yes  
Ventura County – Yes  
Imperial County – Yes**

**Motion passed 6-0**

**5.2 Open Public Hearing**

*The Hon. Jon Edney asked for public comments. There were no comments.*

**5.2.7 City of West Hollywood (Continued)  
Appeal request for an unspecified reduction  
of the City's RHNA allocation**

The Hon. Jon Edney requested staff to give their presentation in response to questions raised in the morning session.

**Staff Presentation**

Ms. Hidsiyan, Associate Regional Planner, summarized the analysis that staff prepared during the lunch break. Ms. Hidsiyan stated that staff looked at the two factors that were put forward by the City of West Hollywood with regard to availability of land and growth in terms of the regional transportation plan. Ms. Hidsiyan explained that staff reviewed the new information and also re-evaluated the information that was previously provided to staff. Ms. Hidsiyan stated that staff was unable to find any supporting documentation for a lack of availability of land for development or for conversion to residential use or under utilized land. She further stated that the Board raised the issue of the size of West Hollywood, but staff's methodology was such that all cities were treated the same. Ms. Hidsiyan explained that staff did not look at the size of the City so much as they looked at the City's growth forecast and the specific context of the City and its opportunities for development. She stated that staff also looked for evidence based on household growth being

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inconsistent with long range growth forecast for the regional transportation plan. While the City did raise concerns that it would not have light rail infrastructure, staff did not look so much at the mode of transportation, but rather to look for evidence that there was inconsistency between household growth and the growth that is being assumed for the transportation plan. Ms. Hidsiyan stated that this last factor was not raised during the initial discussion. She stated that staff also reviewed the forecast analysis and found it to be appropriate.

City Rebuttal

Susan Healy Keene, representing West Hollywood, stated that during staff's report this morning, they heard the growth factor and in fact the population of West Hollywood did decrease from the 1980 consensus to the 1990 consensus and again decreased from the 1990 consensus to the 2000 consensus. Ms. Keene reiterated that in relationship to other Westside Cities, in terms of RHNA allocation versus population, West Hollywood is being allocated a much larger percentage. Ms. Keene also restated that since West Hollywood is the only Westside City that is not getting some sort of rail transportation, the allocation is not warranted and a reduction would be appropriate.

*The Hon. Jon Edney asked for public comments for the City of West Hollywood. There were no comments.*

The Hon. Edney asked the Board's legal counsel, Jeff Margulies, if the Board has the authority to assign additional weight to these factors in determining the numbers. Mr. Margulies stated that it is within the Board's authority. Mr. Margulies further stated that it is the Board's task to determine whether the staff failed to determine the City's share of the regional housing need, in accordance with the information described in the methodology.

A **MOTION** was made by the Hon. Gil Coerper not to accept staff's recommendation and partially approve housing unit reduction from 579 to

440. The Hon. Jon Edney **SECONDED** the **MOTION**. A **ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**



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**Los Angeles County – No  
Orange County – Yes  
Riverside County – No  
San Bernardino County – No  
Ventura County – No  
Imperial County – Yes**

**Motion denied 4-2**

A **MOTION** was made by the Hon. Charles White to deny the appeal and support staff's recommendation. The **MOTION** was **SECONDED** by the Hon. Larry McCallon. A **ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

**Los Angeles County – Yes  
Orange County – No  
Riverside County – Yes  
San Bernardino County – Yes  
Ventura County – Yes  
Imperial County – No**

**Motion passed 4-2**

**5.2 OPEN PUBLIC HEARING:  
Consideration of Appeal Requests**

*The Hon. Jon Edney asked for public comments. There were no comments.*

**5.2.10 City of Orange  
Appeal request to reduce draft RHNA allocation  
By 50% (2,522 units)**

Ms. Harris read and summarized two letters delivered to the Board by Scott Darrell. The first letter dated April 25, 2007 from Eileen McCarthy, Staff Attorney for the Public Law Center, was addressed to President Yvonne Burke, stating that an equitable regional planning approach for future housing development in Orange County is required by law, and further that the proposed distribution fails to accommodate the legislative goal of promoting a balanced distribution and housing production through Orange County Region. The second letter dated April 27, 2007 from Scott

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Darrell, Executive Director of The Kennedy Commission, was also addressed to President Burke. Mr. Darrell states that he is writing on behalf of the Kennedy Commission and the Coalition of Housing Advocates to comment on SCAG's draft RHNA distribution for the Orange County Region. Mr. Darrell also states that the commission does not support the SCAG draft housing needs assessment plan as approved by the Regional Council on February 1, 2007. The letters states the same statistical references to the Orange County Region distribution of 82,602 units. The letter notes that the City of Irvine has over 40% of this distribution. The letter also addresses the 1,100 units in the other cities. Ms. Africa, staff's legal counsel, will retain possession of these letters.

The Hon. Jon Edney stated for clarification that Ms. Harris read these letters for the purpose of noting them in the record. The letters do not reflect the recommendation or opinion of the staff.

Anna Pehovshek, Principal Planner, stated that she will review the City's position, particularly on four points. The first involves the annexation areas in East Orange. Ms. Pehovshek stated that the City has taken another look at the RHNA allocation in relation to the OCP numbers that include the East Orange Annexation areas. Based on the information in the staff report, and also from the center for demographic research, the City acknowledges that an adjustment to the OCP and RHNA are in order to reflect the development in East Orange. However, based on the anticipated development schedule for East Orange, the City believes that the distribution of the construction of these units needs to be reconsidered. The original schedule for this multi-phase project anticipated build-out by 2010, with the first phase of development being completed in 2005. However, grating for the first phase has not yet begun. Ms. Pehovshek stated that it is now expected to be completed in 2008. The final phase of the project that represents 1,200 of the total approved units has come to involve substantial costly infrastructure improvements leading to speculation about the feasibility of their development. If the units were to be constructed, the timing is highly uncertain and would be expected to fall certainly beyond 2014 and possible beyond 2020. Ms. Pehovshek stated that at this time the City would like to request a RHNA adjustment that reflects the anticipated development time frame for the East Orange area as provided in the memorandum presented to the Board this afternoon. As a nearly built-out City, the main opportunities for creation of new housing will come to Orange through the redevelopment of

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property that is currently under commercial and industrial land use designations. In the General Plan update process that is currently in its final stages, land use alternatives are being proposed that would redesignate some areas of commercial and industrial land to newly proposed mixed-use land districts. Specifically, these areas are located in portions of the City that are currently retail and employment nodes, and also are served by transit. Ms. Pehovshek stated that the City was mindful of the need to create diverse housing opportunities and land use alternatives. The new mixed-use areas being proposed fall largely within the boundaries of the City's redevelopment project area. Therefore, any housing projects that come forward would be expected to include an affordable component consistent with the 20% affordability requirement under redevelopment law. Applying this proportion to the RHNA allocation would result in approximately 900 units with fewer low and very low income units than those currently identified in our RHNA allocation. Ms. Pehovshek stated that it is not realistic to expect the City to create a significant number of affordable units above and beyond the 20% that may be generated within the redevelopment area. Ms. Pehovshek's third point was the documentation of the AB 2158 factors. The staff report indicates that the City has not provided documentation of issues related to market demand and high housing cost burden. Our basis for identifying these issues in our appeal is primarily anecdotal as reflected by our experiences with entitled housing projects not moving forward as anticipated. The City is also aware of other recently constructed projects that are experiencing very poor sales. Ms. Pehovshek concurs that the demand for housing certainly exists. However, the current market conditions are slowing the production of new units and therefore the units that had been earmarked for the City's SEP data may fall into time frames beyond 2014. The future pace of housing development in the City involves some degree of speculation, particularly due to the fact that any future housing development sites will involve property redevelopment. When looking at sample properties with redevelopment potential, recent land costs ran at levels as high as \$60 to \$70 per square foot or \$2M to \$3M per acre. Many of these sites also involve industrial contamination or are historic properties that involve contributing buildings to the City's national register listed historic districts. These factors both involve potentially higher redevelopment costs or challenges and constraints that need to be dealt with, but increase the complexity of redevelopment or adaptive reuse. Much of the infrastructure in many of these areas is undersized and aging. Some of

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them are approaching 100 years old and would require extensive and costly upgrading to serve intensified housing development. Ms. Pehovshek stated that the City's final point pertains to the issue of methodology. As noted in the City's appeal, Orange did not agree with the housing development sites that were identified through that process. In reviewing the staff report, it indicates that the Compass Blueprint was actually not used for purposes of generating the RHNA, so at this point the City is requesting clarification of whether or not it was used or to what extent it was used. If the Compass Blueprint was used, the City would like to reiterate their objection. The City has particular problems with isolated parcels in the heart of heavy industrial districts.

Staff Presentation

Ying Zhou, Senior Regional Planner, stated that based on the appeal application form, the City of Orange based their appeal on methodology and two AB 2158 factors. The City wants to reduce the RHNA number from 5,000 to 2500, which is a 50% reduction. The draft RHNA allocation for the City of Orange is consistent with the OCP 2006. Ms. Zhou stated that the center for demographic research at Cal State Fullerton has been actively working with SCAG and the City's in Orange County to develop the Orange County 2006 projection. The City of Orange has participated and endorsed the OCP 2006 provided by CDR. The distribution of housing units in different income levels in the allocation plan for the City of Orange has followed the fair share income methodology adopted by the Regional Council, which states that each city should close the gap between the current income household distribution and the county median distribution by specifically adjusting their respective levels to 110% of the county average. Ms. Zhou stated that in regard to the two AB 2158 factors, which are market demand for housing and the high-housing cost burden, staff did not receive any documentation on these issues to support the appeal.

City Rebuttal

The City did not have a rebuttal.

*The Hon. Jon Edney asked for public comments for the City of Orange. There were no comments.*

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The Hon. Charles White pointed out that the City indicated that staff used a compass process, which is not allowed. Mr. Carreras stated that staff does not use the compass process for allocation purposes. It is used for growth visioning beyond 2015, which is outside of the RHNA planning period.

A **MOTION** was made by the Hon. Carl Morehouse to deny the appeal and accept staff's recommendation. The **MOTION** was **SECONDED** by the Hon. Charles White. A **ROLL-CALL VOTE WAS TAKEN AND RECORDED AS FOLLOWS:**

**Los Angeles County – Yes**  
**Orange County – Yes**  
**Riverside County – Yes**  
**San Bernardino County – Yes**  
**Ventura County – Yes**  
**Imperial County – Yes**

**Motion passed 6-0**

**5.2.11 City of La Canada Flintridge**

**Appeal request for an unspecified reduction of its draft RHNA allocation.**

Robert Stanley, Director of Community Development, distributed some materials to the Board, and stated that the City is addressing the methodology and the AB 2158 factors. Mr. Stanley stated that in the methodology portion, the City is looking at the demolition issue, in particular an appeal letter that the City received from SCAG concerning the number of houses constructed and demolished between 1997 and 2006. During this time period, a total of 223 houses were constructed and 135 were demolished for a net gain of 88 housing units. Staff responded by saying that the growth trends are a measure of households, not housing units, and that the number of demolitions show replacement need. Mr. Stanley stated that staff could not determine the cause of removal of the demolished houses, and also they could not determine whether they were immediately replaced with units of the same type, size, and income group. Mr. Stanley stated that the single-family housing units and households in terms of La Canada are synonymous with new construction. The decennial census data and the congestion management plan data that were provided to staff both bare this out. The units that are being demolished are being replaced with like units. In addition, there are no units lost or

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converted to non-residential uses. This is because they are one-for-one replacement, and they are single-family homes. Mr. Stanley stated that the property owners want to improve these homes and are choosing to demolish the homes and build larger homes in the area. La Canada Flintridge has a population of 21,000 and is 8 ½ square miles. The demolition methodology was incorrectly applied by staff because there have been no multi-family units demolished in the last ten years. There have been no multi-family units constructed in the same time period. In terms of methodology, housing prices have increased dramatically over the past 10 years. According to the data report in the April 22, 2007 Los Angeles Times real estate section, the median house price in La Canada Flintridge was \$1.7 M. The City has a trend to replace those homes with more expensive housing, taking 1,200 to 2,000 square foot homes and replacing them with 4,000 to 9,000 square foot homes. This is a reflective trend nationwide for larger homes to be constructed both as replacement or entirely new homes and is not unique to the City. However, in La Canada the purchase price of a tear down home is approximately \$1M. So therefore, this is not affordable housing being replaced with market rate housing. Mr. Stanley stated that in terms of the AB 2158 factors, the City has been struggling with sewer issues for the past nine years. With septic systems and the regional water board becoming more strictly regulated, the City has tried to provide as much sewer as possible. The City has raised concerns regarding sewer capacity and the fact that some of the decisions about sewer capacity are made by outside bodies, which are not controlled by the City. Staff responded to these concerns by stating that this does not preclude growth in the City, and the City does not specify how much of the City is affected. The City is currently served by four sewer districts. Two of those are currently under construction. They are not anticipated to be completed for another 2 to 3 years. Some of the sewer districts are controlled by La Crescenta Valley Water District and the Cities of Glendale and Los Angeles. The water district is providing the sewer service. Glendale is allowing La Canada a certain capacity to move through their city through some of their lines. The City of Los Angeles is doing the purification of the affluent when it reaches their plant. Therefore, all of this is out of our City's control. Mr. Stanley stated that according to the data provided to the City by its consultant, there is an estimated capacity for 155 units based on ultimate build-out anticipated in the service area. The build-out is based on current zoning. If the City were to take on any units beyond that zoning, the City would be exceeding their capacity. The City is also in the process of trying to have voters

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approve district five. If this is passed, it is unlikely that the sewer service would be completed during the RHNA planning period. The area is currently on septic systems, which is highly regulated and limited due to problems of high ground water and granite. Mr. Stanley stated that the City has experienced a number of problems with the County Health Department, which implements the septic system. There are two lots that are currently standing vacant. They will not allow anyone to build there because of the high ground water and the septic issue. The City has two other sewer areas, but they are also limited in their capacity to provide service. Mr. Stanley stated that according to monitoring flows, they will be at capacity when area two reaches its build-out in 2008. In terms of the number of units for demolition, the City would like to reduce that from 233 units to 68 units. Alternatively, if that is denied, the City would request a sewer capacity reduction, which would be a reduction of approximately 78 units.

Staff Presentation

Ma'Ayn Johnson, Associate Regional Planner, stated that there does not appear to be any new arguments made, rather just new numbers, and another map presented. It extrapolates what they have already given us in their appeal application. Ms. Johnson stated that in terms of the methodology, staff believes that the application is incorrect in the replacement need with household growth. These are components of the total integrated growth forecast for the RHNA process. It includes a growth forecast, which is the anticipated household growth for that jurisdiction. It also includes a replacement need, which is calculated separately and also includes the vacancy adjustment factor. Those components cannot be interchanged. 88 housing units cannot be applied in this way because they are separate components, and that was the adopted methodology by the Regional Council. Ms. Johnson stated that in terms of sewer capacity, the law states that any supply and demand decisions must be made by an entity other than the City. In arguments provided both in their appeal application and today at the hearing do not prove that it is a decision made by an entity other than the jurisdiction. The City only talks about capacity from their standpoint, but there is no documentation or statement from the actual water or sewer jurisdiction stating the contrary.

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City Rebuttal

Mr. Stanley stated that in terms of the sewer capacity, the City was able to demonstrate with the information we provided that a large chunk of that area is out of our decision making process and that is the portion that is going through La Crescenta Valley District, Glendale, and Los Angeles. Mr. Stanley stated that it is totally out of the City's ability to change the capacity on that line. As far as the numbers on the existing capacity on the line, the City has already provided that number, and our consultant states that based on flow capacity, it will be maxed out by 2008. The City is trying to put sewers in currently, but it must go to a vote of the people that live in the area. By the time sewers are put in that area, it will be beyond the planning period of 2014. The homes that are there are on septic systems, and they are heavily impacted by the high ground water and the granite. Mr. Stanley stated that it is being regulated by the county and the regional water control board, which the City has no control. The City must obey those laws and requirements.

*The Hon. Jon Edney asked for public comments for the City of La Canada Flintridge. There were no comments.*

Hon. Morehouse stated that he believed the City has made a valid case regarding capacity of sewer/water service. Hon. Morehouse requested that staff restate why they believe the City's case is not valid.

Staff Rebuttal

Joe Carreras, Program Manager, stated that the concern we have is that there is no way to quantify just how much of a reduction might be warranted by lack of sewer capacity. The net effect has not been quantified in the material presented to us. Ms. Harris stated that with the new information presented to us today, we feel there is validity to the restrictions placed. The applicant has proposed for the first time a reduction to 155 units. Ms. Harris stated that staff needs time to look at the area covered and the capacity of the area before we can concur. Ms. Harris further stated that staff would most likely want to amend its recommendation to partially approve the application, but staff is not ready to give a number at this time.

Hon. Edney concurred and requested that the section be read by Mr. Margulies to clarify the difference between a City stating that they do not have sewer capacity and what the applicant is presenting in this case. Mr.



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Margulies read the AB 2158 Factor (2) (a) is lack of capacity for sewer or water service due to Federal or State laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdictions that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period.

Hon. Edney stated that he requested the clarification because other jurisdictions have raised the same issue that they do not have adequate sewer capacity. Hon. Edney further stated that he wanted concurrence from the Board to request staff to analyze the information that has been provided in regard to the City's sewer capacity. Mr. Margulies stated that there were two different sewer issues. 1) the City states that due to regulations and restrictions, the sewer capacity is out of their control; and 2) The City cannot build the sewer fast enough to meet the time frame. Mr. Margulies asked if the City was contending that the second part is also out of their control.

Mr. Stanley stated that the City contends that both issues are out of their control. The City could build it, but it would not be completed during the planning period.

A **MOTION** was made by the Hon. Charles White to direct staff to review the information submitted with respect to factors regarding sewer service and to review documentation to assess their proposal of 155 units as the final RHNA allocation. The **MOTION** was **SECONDED** by the Hon. Gil Coerper and **UNANIMOUSLY APPROVED**.

The Hon. Edney stated that the Board will reconvene on this matter tomorrow and it will be heard as the first appeal after lunch.

**5.2.12 City of Long Beach**

**Appeal request seeking an unspecified  
Reduction of its draft RHNA allocation.**

Angela Reynolds, Planning Manager for the City of Long Beach, stated that she would be addressing issues related to AB 2158 factors, which will support the City's claim that the RHNA allocation of 11,193 units for the City is too high. 1) Methodology; the City's allocation for the last RHNA period was 517 units, based on a forecasted population growth of 9%. With a 5% population growth, the allocation for this RHNA period has

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increased to 11,193 units. Ms. Reynolds stated that in the past 7 years, the City has built about 400 units per year, which is only 30% of the 1,300 units that are called for in the City's RHNA allocation. Ms. Reynolds further stated that due to a "hot" housing market in the past, the City is now experiencing declines in the market. Ms. Reynolds stated that it is unrealistic to believe that the City can meet this allocation number. 2) Jobs-housing balance; Ms. Reynolds stated that in spite of the fact that the jobs-housing balance is a goal of the SCAG region and one that is in the City's General Plan, the RHNA allocation has Orange County moving in a direction of becoming more "jobs heavy". Ms. Reynolds stated that as a major city with nearly ½ million residents, Long Beach does not want to become a bedroom community to Orange County or any other city in the region. 3) Vacancy rate; projected housing units are computed using the projected households and total vacancy rate. In the 2000 census, Long Beach had an overall vacancy rate of 3.4% compared to the 2.7% for the SCAG region. Since the year 2000, the City's vacancy rate has normalized to more closely resemble that of the region. Ms. Reynolds stated that as this high vacancy rate affects our unit forecast in this upcoming RHNA period, the City maintains that the allocations are inappropriate and inflated. 4) Change circumstances; the City believes that the population methodology is high for the region, not just for Long Beach. The City is also experiencing a decline of school age kids. Ms. Reynolds stated that the number of live births in the district has declined an average of 217 individuals each year in the past 14 years. In the upcoming RHNA period, it is projected to decline by 15,500 students for a 17% decrease. 5) Distribution of household growth; the City agrees with the distribution of household growth to maximum use of public transportation and existing transportation infrastructure. Long Beach has the Blue Line and four or five rail stations. In the General Plan, the City is trying to develop those RHNA stations and bring some density there. Ms. Reynolds stated that Long Beach is the second largest city in the SCAG district, and wants to do their part. She further stated that it is the City's desire to build housing. There are many opportunities with the City's arterials, and commercial space that is not performing at its highest and best use.

Staff Report

Dr. Simon Choi, Senior Regional Planner Specialist, stated that staff's recommendation is to deny the appeal request. The major basis for the proposed reduction request includes the RHNA methodology and AB

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2158 factors. Dr. Choi stated that regarding the factor of jobs-housing balance, SCAG's integrated growth forecast indicates that the jobs-housing balance ratio would remain stable at approximately 1.1 during the RHNA planning period. Regarding the distribution of household growth assumed for the purpose of comparable transportation plans, Dr. Choi stated that staff assumes that the Compass Blueprint strategy is not implemented during the RHNA planning period. Dr. Choi further stated that regarding change circumstances, the City contends that SCAG used the county level population forecast as a way to derive household size, and noted that it experienced a decline in the school age population. Dr. Choi referred to the recent 5-year growth of the City, and noted that the 28,000 additional population growth and the 2,300 household growth, resulted in a ratio of 10.

Mr. Carreras addressed the issue of the RHNA allocation this period as compared to the last RHNA period. Mr. Carreras stated that in the mid-90s when the last RHNA forecast was being developed, Long Beach was in a huge economic depression due to aerospace cutbacks and closing of the Long Beach Naval shipyard. Mr. Carreras pointed out that this is in stark contrast to the forecast period starting with the 2004 RTP and moving forward through this integrated forecast period, where the economic outlook for the City of Long Beach is much different. This is reflected in the anticipated employment population and housing growth that is part of our projection.

City Rebuttal

Ms. Reynolds stated she is requesting an allocation reduction as a result of the City's GIS component. The City looked at three different build-out scenarios. After assessing the City's current General Plan, zoning issues, undervalued parcels, and consolidation of lots for maximum density, the City came to the conclusion that the most realistic allocation would be a reduction of 1,693 units.

*The Hon. Jon Edney asked for public comments for the City of Long Beach. There were no comments.*

The Hon. Morehouse asked staff if the City were to provide justification, as they have indicated they can, would staff support an adjustment.

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Ms. Harris stated she would have to defer to the forecasting staff. Dr. Choi concurred with the City of Long Beach. Dr. Choi stated that staff recognizes the slow growth of the City of Long Beach. He stated that staff was able to analyze the City's historical trend, for the short term and long term period. Dr. Choi stated that forecasting always carries some uncertainty and staff acknowledges that element. Dr. Choi further stated that given the size of Long Beach, the reduction of 1,693 is acceptable. Ms. Harris stated that staff had some concerns during the RHNA process because they did not have participation from the City of Long Beach in the last eight months. Ms. Harris stated that it was important to note that the City of Long Beach was not available to take advantage of the opportunity to make informal revisions to the preliminary draft numbers.

A **MOTION** was made by the Hon. Larry McCallon to direct staff to review the GIS information submitted by the City, and consider the request of a total allocation reduction from 11,193 to 9,500. The **MOTION** was **SECONDED** and **UNANIMOUSLY APPROVED**.

The Hon. Edney stated that the Board will reconvene on this matter tomorrow, and it will be heard as the second appeal after lunch.

**6.0 CHAIR'S REPORT**

**7.0 FUTURE AGENDA ITEMS**

The RHNA Appeals Board Agendas for April 26<sup>th</sup>, April 27<sup>th</sup>, and April 30<sup>th</sup> have been prepared and distributed.

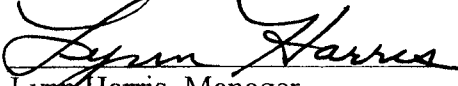
**8.0 SET NEXT MEETING DATE**

The next hearing is scheduled for April 26, 2007 at 9:00 AM.

**9.0 ADJOURNMENT**

Hon. Edney adjourned the hearing at 6:25 PM.

Minutes Approved By:

  
Lynn Harris, Manager  
Community Development